



FAA Certified No. XQ2R302L

## **PACIFIC MAGNETIC & PENETRANT CO., INC**

MAGNETIC AND PENETRANT INSPECTION  
PASSIVATION • GLASSBEAD • CHEMICAL ETCH



MT • PT  
CHEMICAL PROCESSING

1/15/2007

Kim Muratore (SFD-7-5)  
US EPA, Region 9  
75 Hawthorne St.  
San Francisco, CA. 94105

Re: Request for Information  
San Fernando Valley Area 1/North Hollywood Superfund Site ("the Site")

Dear Ms. Muratore:

Before answering the questions in your letter dated November 22, 2006 that was addressed to Pacific Magnetic & Penetrant Co., Inc. (PMP) at 6837 Farmdale Ave, North Hollywood, CA 91605, I want to reiterate that operation of PMP at 6837 Farmdale Ave has never released or been a threat to release hazardous substances and pollutants or contaminants into the environment on the property located at 6837 Farmdale Ave or at any other location.

***Supplemental questions:***

- 1) Pacific Magnetic & Penetrant Co., Inc (PMP) has no corporate affiliation with Pacific Steel Treating Co., Inc. (PST). The original assets of PMP were sold to Niels Bruun-Andersen by PST in 1992. Then PMP accepted and acquired the assets valued at \$350,000.00, consisting of equipment, leasehold improvements, account receivables, customer lists and goodwill, from Niels Bruun-Andersen in 1992. *Attached* is the Organization Meeting of Incorporator and Directors of Pacific Magnetic & Penetrant Co., Inc. dated September 30, 1992, and the 10 year, 10% Registered Debenture Note.
- 2) Pacific Magnetic & Penetrant Co., Inc. list of officers, directors and shareholders for the two years after its incorporation in 1992.

Officers:

Erik Bruun-Andersen - President  
Niels Bruun-Andersen - Vice President  
Niels Bruun-Andersen - Secretary  
Niels Bruun- Andersen - Treasurer

Directors:

Niels Bruun-Andersen  
Erik Bruun-Andersen

Shareholders:  
Niels Bruun-Andersen  
Erik Bruun-Andersen

- 3) The March 26, 1998 letter from the EPA and the Los Angeles Regional Water Quality Control Board is addressed to Pacific Magnetic & Penetrant Co., Inc., at 6829 Farmdale Ave. PMP never operated at 6829 Farmdale Ave. Historically the EPA and the Regional Water Quality Control Board would incorrectly give PMP the address of 6829 Farmdale Ave. because that is what is in some of their data bases. At other times they would use the correct address of 6837 Farmdale Ave.

Pacific Steel Treating Co., Inc operated exclusively at 6829 Farmdale Ave.  
Before 2006 PMP operated exclusively at 6837 Farmdale Ave.

The March 26, 1998 letter has PMP File Number: 111.2505 on the letter and not Pacific Steel Treating Co., Inc. file number 111.0822.

Also, please reference the letter from Cal/EPA dated November 5, 1997 addressed to PMP at 6837 Farmdale Ave. Note the company File Number 111.2505 and the correct using of the company address of 6837 Farmdale Ave.  
*Attached* are both letters.

***Previous questions:***

- 2) The last contact person for Pacific Steel Treating was Lars Bruun-Andersen, FX-6 Personal Privacy His current address is FX-6 Personal Privacy  
FX-6 Personal Privacy
- 9) Pacific Magnetic & Penetrant Co., Inc (PMP) has no corporate affiliation with Pacific Steel Treating Co., Inc. (PST). The original assets of PMP were sold to Niels Bruun-Andersen by PST in 1992. Then PMP accepted and acquired the assets valued at \$350,000.00, consisting of equipment, leasehold improvements, account receivables, customer lists and goodwill, from Niels Bruun-Andersen in 1992. *Attached* is the Organization Meeting of Incorporator and Directors of Pacific Magnetic & Penetrant Co., Inc. dated September 30, 1992 and the 10 year, 10% Registered Debenture Note.
- 11) PMP stock has been owned FX-6 Personal Privacy Niels Bruun-Andersen and/or Erik Bruun Andersen since the company incorporated in 1992.

PMP Officers:

Erik Bruun-Andersen	President 1992- present
	Secretary 1993- present
	Treasurer 1993- present

Niels Bruun-Andersen	Vice President 1992 - 1997
	Secretary 1992 - 1993
	Treasurer 1992 - 1993

George Miller	Vice-President 1997 – present
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I have no records for Pacific Steel Treating Co., Inc.  
PMP records start in 1992.

Niels Bruun-Andersen was the owner and in charge of management at Pacific Steel Treating Co., Inc. from its inception and throughout until the close of the company in 1992.

Erik Bruun-Andersen did not ever own any part of Pacific Steel Treating Co., Inc.

Pacific Magnetic & Penetrant Co., Inc - Erik Bruun-Andersen began in 1992.

- 15) The owner of the property at 6829 Farmdale Ave prior to 2003 was:

2001-2003 Pacific Steel Treating Co., Inc.

2001 - Previous Erik & Else Bruun-Andersen Trust

I have no records for Pacific Steel Treating Co., Inc. and the Erik & Else Bruun-Andersen Trust.

The owner of the property at 6837 Farmdale Ave prior to 2003 was:

2001-2003 Brander Farmdale Investment, LLC

2001- Previous Erik & Else Bruun-Andersen Trust

PMP rented the property at 6837 Farmdale Ave on a month to month basis for the years 2001-2003 from Brander Farmdale Investment, LLC. There were no written lease agreements between PMP and Brander Farmdale Investment, LLC. I have no records for Brander Farmdale Investment, LLC.

PMP rented the property at 6837 Farmdale Ave on a month to month basis for the years 1992-2001 from The Erik & Else Bruun-Andersen Trust. There were no written lease agreements between PMP and The Erik & Else Bruun-Andersen Trust. I have no records for The Erik & Else Bruun-Andersen Trust.

PMP has no lease agreements documents for the years 1978-1992. PMP documents begin in 1992.

Contact info: Pacific Steel Treating Co., Inc., Erik & Else Bruun-Andersen Trust and Brander Farmdale Investment, LLC is Lars E. Bruun-Andersen, FX-6 Personal Privacy

## FX-6 Personal Privacy

- 16) The owner of the property at 6837 Farmdale Ave prior to 1992 was:

1992 – previous Erik & Else Bruun-Andersen Trust

PMP has no lease agreements documents for the years 1978 – 1992. PMP documents begin in 1992.

Contact info: The Erik & Else Bruun-Andersen Trust is:

Lars E. Bruun-Andersen FX-6 Personal Privacy

## FX-6 Personal Privacy

- 17) Regarding PMP hazardous substances and disposal practices at 6837 Farmdale from 1992-2006, Erik Bruun-Andersen was the employee that handled those procedures. Starting in 2006, PMP began operations at 6829 Farmdale Ave. and Erik Bruun-Andersen was the employee that handled the practices of hazardous substances and disposal practices for PMP.

- 18) PMP website states that its operations at 6837 Farmdale Ave are located in a 10,000 sq. ft. facility. The website is in error. Correctly stated, the total property lot size is 9,880 sq. ft. (i.e. 10,000 reference to website) including parking lot and loading areas. The actual building size on this lot is 4515 sq. ft. The size of the building at 6837 Farmdale Ave. has always been the same, (105 X 43). Total sq. ft. 4515.

PMP current operations at 6829 Farmdale Ave are in 5629 sq. ft. building, 882 sq. ft. office and 2574 sq. ft. covered storage.

### *Documents Attached.*

- 19) 6837 Farmdale Ave for the years 1992-2006 had one above ground three-stage clarifier and one sump, which were plumbed to the clarifier. The two 75 gallon chromium tanks were batch treated tanks and were never plumbed to any sump or clarifier. Property description, site plan, manufacturing process layout and building diagram have been provided for 6837 Farmdale Ave.

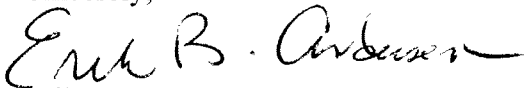
6829 Farmdale Ave. for the years 2006-present has one above ground three stage clarifier and two sumps which are plumbed only to the clarifier as shown.

Property description, site plan, manufacturing process layouts and building diagram have been provided for 6829 Farmdale Ave.

20) Copies of PMP hazardous materials and chemical inventory forms submitted to city, county and state agencies have been provided for 6837 Farmdale Ave. for the years 1992-2006.

23) PMP has no documents or information regarding a 1989 Phase I or a 1990 Phase II investigation. To the best of my knowledge there has been no sampling or remediation done at any part of 6837 Farmdale Ave. PMP has no records of sampling or remediation done at 6837 Farmdale Ave.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik B. Andersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Erik Bruun-Andersen

Pacific Magnetic & Penetrant Co., Inc.

# Supplemental Question #1

## ORGANIZATION MEETING OF INCORPORATOR AND DIRECTORS OF PACIFIC MAGNETIC & PENETRANT CO., INC.

September 30, 1992

The organization meeting of the sole Incorporator and Board of Directors named in the Articles of Incorporation was held at the office of the corporation at Sioux Falls, South Dakota, on the above date at the call of all the Incorporator and upon Waiver of Notice. Director and Incorporator present were: Niels Bruun-Andersen and Bradley C. Grossenburg. The meeting organized for the transaction of business with Erik B. Andersen acting as Chairman and Niels Bruun-Andersen acting as Secretary.

A Code of By-Laws number from I to XI, inclusive, was presented and after being considered section by section, was on motion unanimously carried and adopted and ordered filed.

Nominations were then entertained for the officers of the corporation and the following were nominated.

Erik B. Andersen	-	President
Niels Bruun-Andersen	-	Vice President
Niels Bruun-Andersen	-	Secretary
Niels Bruun-Andersen	-	Treasurer

There being no further nominations, it was moved that nominations cease and that a unanimous ballot be cast for such nominees, which motion was duly seconded and unanimously carried and such officers were thereupon declared to be elected to serve until the next annual meeting and until their successors be elected.

The Chairman proposed the transfer to the corporation certain assets, inventory, real property, cash and certain liabilities, in exchange for the capital stock of the corporation. The Chairman then presented the following resolution and moved its adoption.

"BE IT RESOLVED that the corporation accept and acquire the assets of Niels Bruun-Andersen on this date; said assets consisting of equipment of the value of \$63,325.43; leasehold improvements in the value of \$6,793.54; accounts receivable in the amount of \$150,852.49; customer lists and base in the amount of \$100,000.00; and goodwill in the amount of \$29,028.54, all as described in Schedule A, attached hereto and by reference made a part hereof; and

BE IT FURTHER RESOLVED that Niels Bruun-Andersen assign, transfer, convey and deliver to the corporation the property described and execute any other instruments as may be required for the purposes of completing the assignment of transfer of title to such property to the corporation; and

BE IT FURTHER RESOLVED that the transfer of said assets are necessary for the business of the corporation, which property the Board of Directors does hereby declare in its judgment to be of the value above set forth; and

BE IT FURTHER RESOLVED that in consideration of the happening of the aforesaid transfer, the proper officers be and they are hereby authorized and directed to execute, issue and deliver in the name and on behalf of this corporation stock for 50,000 shares of Class A Common and 100,000 shares of Class B Common to Niels Bruun-Andersen, which stock shall be deemed fully paid

and nonassessable, and a corporate Debenture Note in the amount of \$200,000.00, a copy of which is attached as Exhibit B, and that the officers shall be and hereby are authorized and empowered to execute any and all agreements in connection with said transfer and all writings necessary or expedient for such purpose."

Said motion was duly seconded and unanimously carried and the officers of the corporation were directed to proceed accordingly.

The Chairman moved that the corporation proceed to conduct its business as of September 29, 1992, in accordance with its Articles of Incorporation, which motion was duly seconded and unanimously adopted.

On motion seconded and unanimously carried, a resolution was adopted fixing the number of Directors of the corporation at one until such time as it may be deemed advisable to change such number by further resolution of the Directors.

On motion seconded and unanimously carried, the Certificate of Incorporation from the Secretary of State was ordered accepted and filed as a permanent record of the corporation and the officers were directed to file for a Certificate of Authority for the corporation to transact business within the State of California.

The Secretary moved the adoption of a resolution regarding the signing of checks and the making of bank loans in the form of



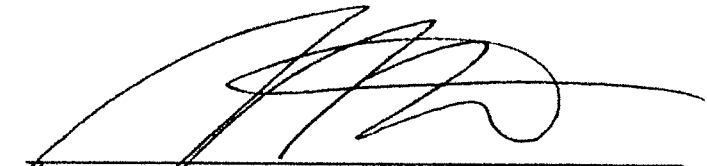
a Resolution attached to these Minutes. Such motion was duly seconded and unanimously adopted.

A form of stock certificate was presented, and upon motion duly made, seconded and adopted, was unanimously approved.

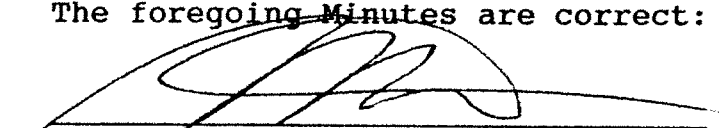
The corporate seal, an impression of which is affixed in the margin hereof, was approved as the corporate seal of the corporation upon motion duly made, seconded and unanimously approved.

There was a discussion about the feasibility of complying with the provisions of Section 1244 of the Internal Revenue Code so that the corporation's par value of common stock would qualify as Section 1244 Small Business Stock. On motion duly made, seconded and carried unanimously, the "Plan for Section 1244 Stock" attached to these Minutes was adopted.

There being no further business to come before the meeting, it was on motion adjourned.

  
Secretary

The foregoing Minutes are correct:

  
Niels Bruun-Andersen

---

Bradley C. Grossenburg

# Supplemental Question #1

## PACIFIC MAGNETIC & PENETRANT CO., INC. 10 YEAR, 10% REGISTERED DEBENTURE NOTE

Note No. 1

\$200,000.00

Pacific Magnetic & Penetrant Co., Inc., a South Dakota corporation (the "Corporation") is indebted and for value received, promises to pay to the registered holder of this Debenture Note (unless it has been duly called for redemption and payment of the redemption price made or provided for) upon presentation hereof the sum of \$200,000.00 in legal tender of the United States of America on September 30, 2002, at the principal office of the corporation in North Hollywood, California.

The Corporation further agrees to pay interest on the principal amount from time to time remaining upon this Debenture Note, from October 1, 1992, at the rate of ten percent (10%) per annum, payable quarterly on the first day of January, April, July and October of each year.

The principal of, and interest on, this Debenture Note shall be payable at the principal office of the Corporation, except that with respect to the interest, the corporation shall, upon request to the registered holder hereof, mail a check or draft representing interest to the registered holder at the address appearing on the books of the Corporation. The registered holder and the Corporation may agree to the payment of both interest and principal in any other manner.

At the election of the Corporation, its successors or assigns, the Debenture Note is subject to partial payment of principal or redemption in full on any interest payment date prior to maturity, on payment of the respective principal amount of, and accrued interest on, the Debenture Note, upon giving notice of its election to prepay or redeem by mail, directed to the registered holder of the Debenture Note at least thirty (30) days prior to the date of prepayment or redemption.

If the Corporation defaults in payment of the principal of, or interest on, this Debenture Note then the total principal amount of, and all interest due on this Debenture Note shall be immediately due and payable and the Corporation shall immediately pay the same. The registered holder shall be entitled to seek any and all legal remedies which are available to the registered holder in collecting the amounts due under this Debenture Note.

Books for registry of this Debenture Note are kept at the principal office of the Corporation. No transfer of this Debenture Note shall be valid unless made on the Corporation's books at the office of the Corporation by the registered holder.

Payment to the registered holder hereof of the principal or interest shall be a complete discharge of the Corporation's liability of the payment. The Corporation may, at any time,

require presentation of the Debenture Note as a condition of payment.

IN WITNESS WHEREOF, the Corporation has signed and sealed this Debenture Note on October 1, 1992.

PACIFIC MAGNETIC & PENETRANT CO., INC.

(CORPORATE SEAL)

By

Erik B. Andersen  
PRES.

ATTEST:

  
Secretary

REGISTRATION OF  
PACIFIC MAGNETIC & PENETRANT CO., INC.  
10 YEAR, 10% REGISTERED DEBENTURE NOTE

Date of  
Registration

10-1-92

In Whose Name  
Registered

Niels Bruun-Andersen

Address

FX-6 Personal Privacy

ASSIGNMENT

Date of  
Assignment

MAY 30-1994

In Whose Name  
Registered

NIELS BRUUN-ANDERSEN  
TRUST DATED  
NOV. 1-1996

Address

FX-6 Personal Privacy



*Supplemental Question # 3*  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

March 26, 1998

PACIFIC MAGNETIC & PENETRATE  
6829 FARMDALE AVE. ← *incorrect ADDRESS*  
N. HOLLYWOOD, CA 91605-  
File Number: 111.2505 ← *PMP'S FILE number*

RE: SAN FERNANDO VALLEY SUPERFUND AREAS U.S. EPA AND LARWQCB  
NOTIFICATION OF NO FURTHER ACTION

For property located at: 6829 FARMDALE AVE.  
NORTH HOLLYWOOD, CA 91605-

Dear Owner/Operator,

The California Regional Water Quality Control Board, Los Angeles Region ("Regional Board") staff has conducted an assessment of your facility to determine the extent of solvent usage and to assess past and current chemical handling, storage and disposal practices. Your company is among those in the San Fernando Valley which have received the Regional Board's "No Further Action" letters based on one or more of the following categories: 1) information provided in your pre-inspection questionnaire disclosed little or no solvent use; 2) the results of a staff inspection disclosed little or no solvent use; or 3) completed assessment work indicated insignificant or no solvent contamination in soil.

The purpose of this letter is to inform you that, based on the information provided to U.S. EPA by the Regional Board to date, you will not be asked by the U.S. EPA or the Regional Board to participate in regional groundwater cleanup projects currently planned for San Fernando Valley. Your company is no longer part of the U.S. EPA Superfund process, and the Regional Board and U.S. EPA plan no further action concerning your facility.



**Cal/EPA**

**Los Angeles  
Regional Water  
Quality Control  
Board**

101 Centre Plaza Drive  
Monterey Park, CA  
91754-2156  
(213) 266-7500  
FAX (213) 266-7600

*PMP's correct file number with  
correct using of address.*

November 5, 1997

Erik B. Andersen, President  
Pacific Magnetic and Penetrant Co., Inc.  
6837 Farmdale Avenue  
North Hollywood, CA 91605

NO FURTHER REQUIREMENTS - PACIFIC MAGNETIC AND PENETRANT CO.,  
INC., 6837 FARMDALE AVENUE, NORTH HOLLYWOOD (FILE NO.  
111.2505)

According to our records, the subject facility has been occupied by a metal parts inspection business for more than ten years. During our inspections on January 23, 1991, and November 4, 1997, Board staff noted potential sources of liquid wastes including storage and process areas where acids, acetone and oil were used. The facility was observed to be clean and well maintained and no evidence of spillage was noted. Based on our inspections and information submitted, we have no further requirements with respect to the Well Investigation Program.

Please contact the undersigned at (213)266-7531 if you have any questions.

ERIC NUPEN, R.G.  
Senior Engineering Geologist

cc: Lance Richman, USEPA Region IX, San Francisco  
Mel Blevins, ULARA Watermaster



Pete Wilson  
Governor

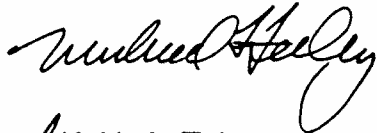



Recycled Paper

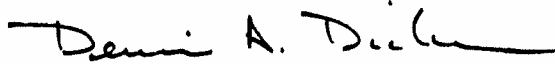
*Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.*

You may be contacted by those potentially responsible parties ("PRPs") that have been asked to participate in the groundwater cleanup efforts. In the event you are contacted by PRPs, please feel free to contact the appropriate Regional Board or U. S. EPA staff for additional information or assistance. The telephone numbers of Regional Board and U. S. EPA staff are provided on the enclosed contact list.

Sincerely,



 Keith A. Takata  
Director  
Superfund Division  
U. S. EPA, Region 9

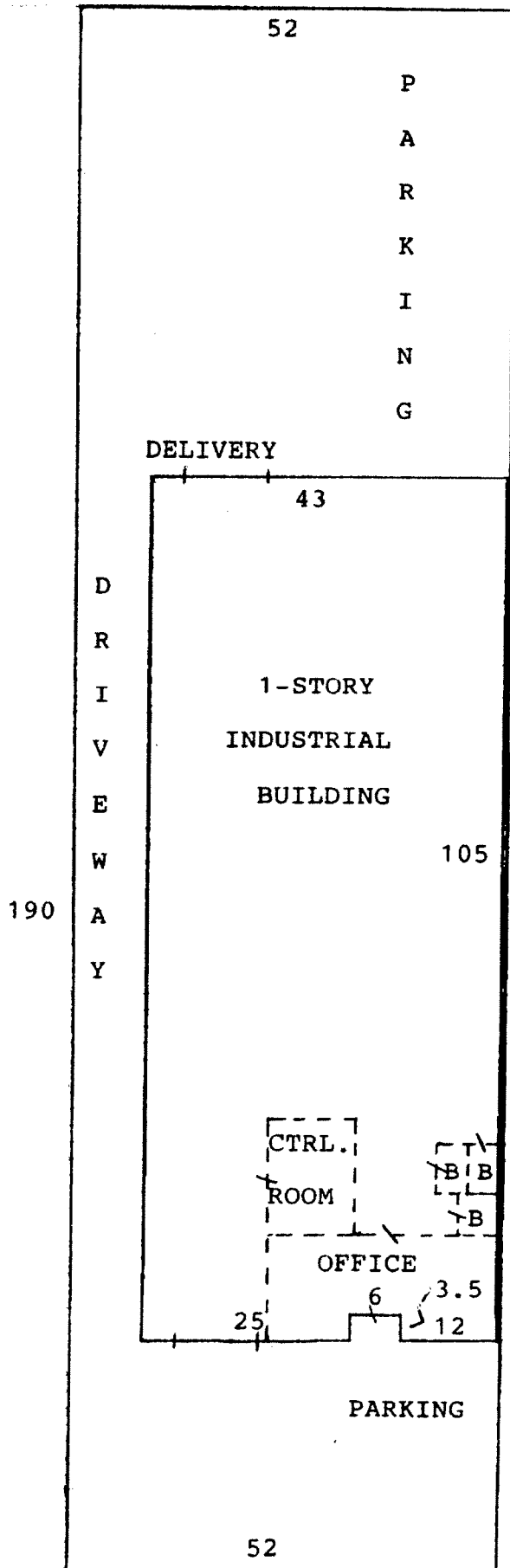


Dennis A. Dickerson  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region

Enclosure



Questions #18 #19 #20



6837 FARMDALE AVENUE

GROSS BUILDING AREA:

$$43 \times 105 = 4,515$$

$$6 \times 3.5 = (\underline{21})$$

TOTAL GBA: 4,494 SF

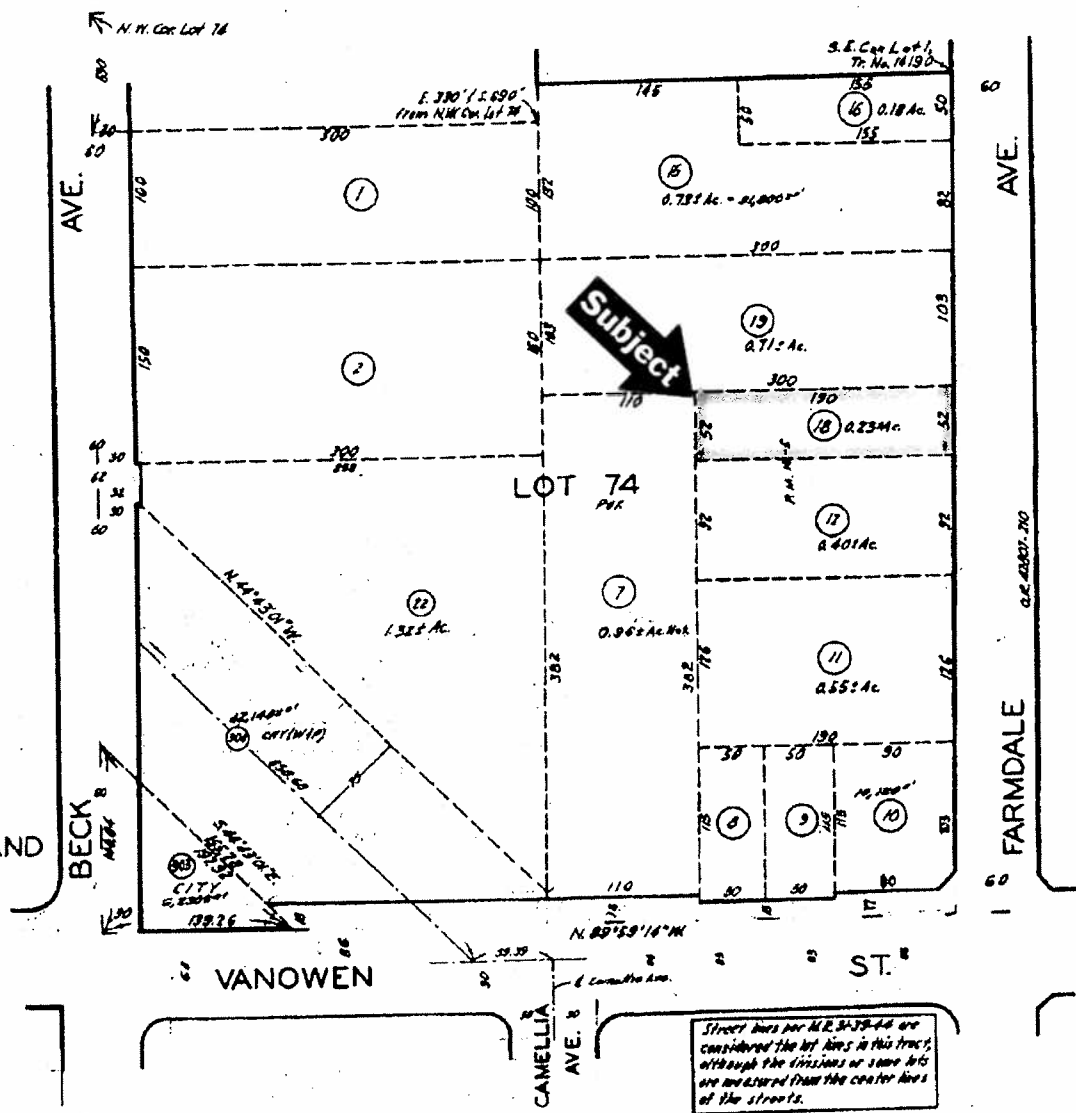
N →

FARMDALE AVENUE

PROPERTY OF THE  
 J. KERSHIM RANCH LAND  
 & WATER CO.  
 M.R. 31-39-44

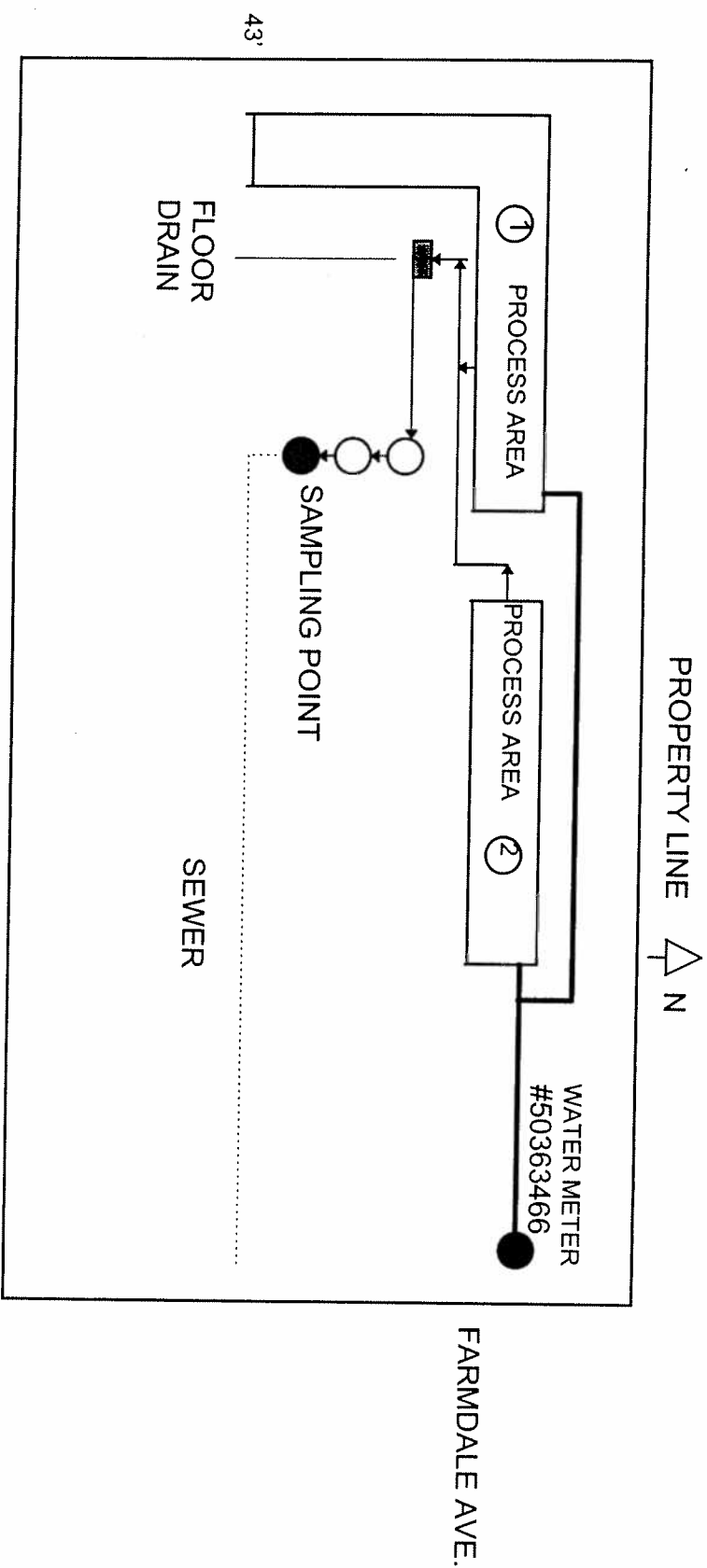
CODE  
 13

FOR PREV. ASSM'T. SEE: 916-12 & 16



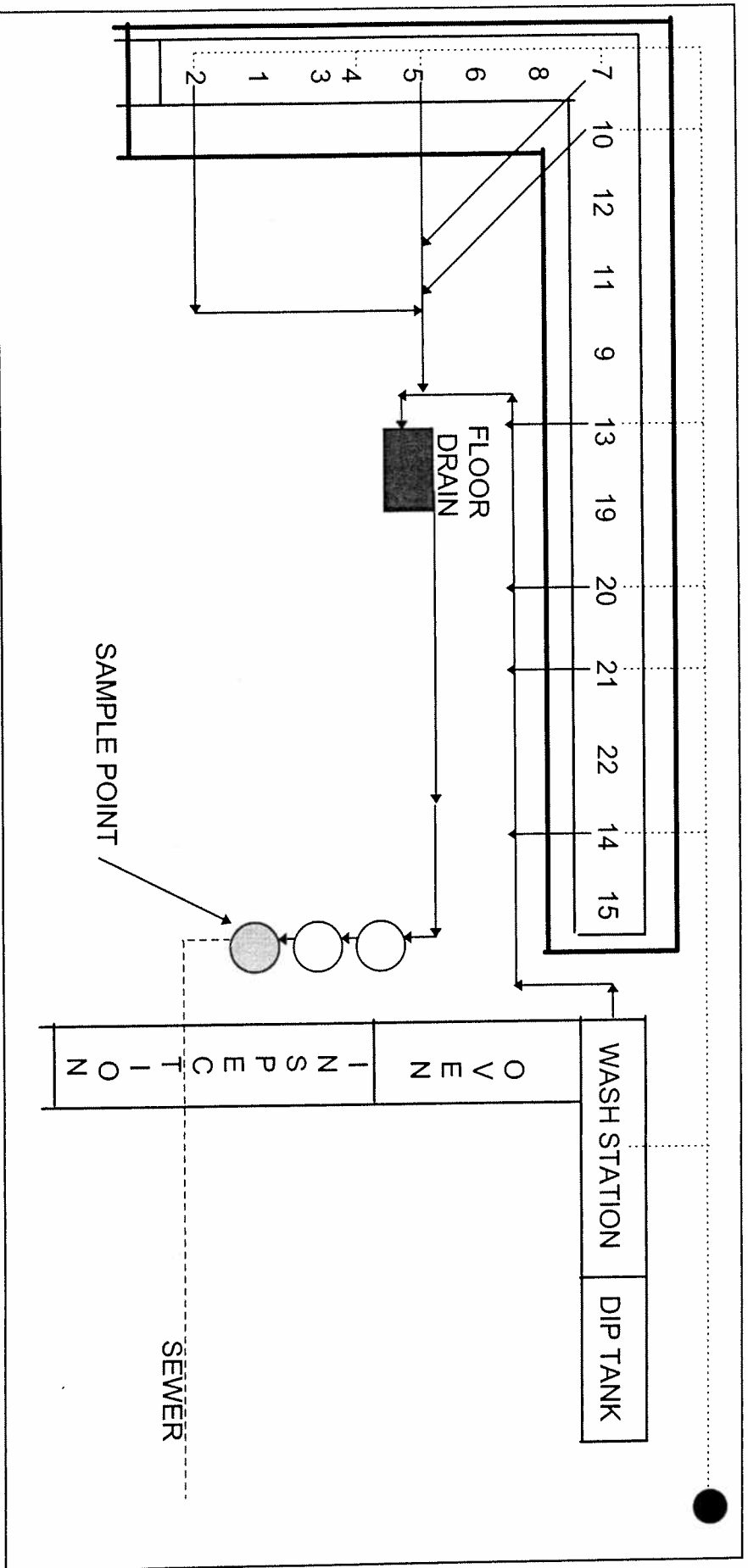
- ① Process number
- Water Meter
- Sample Point
- Floor Pit

# **SITE PLAN**



Site Plan  
 Pacific Magnetic & Penetrant Co., Inc.  
 6837 Farmdale Ave.  
 North Hollywood, CA. 91605  
 Drawn By : Erik B. Andersen 5/19/99  
 Approved By : Erik B. Andersen 5/19/99

# MANUFACTURING PROCESS LAYOUT

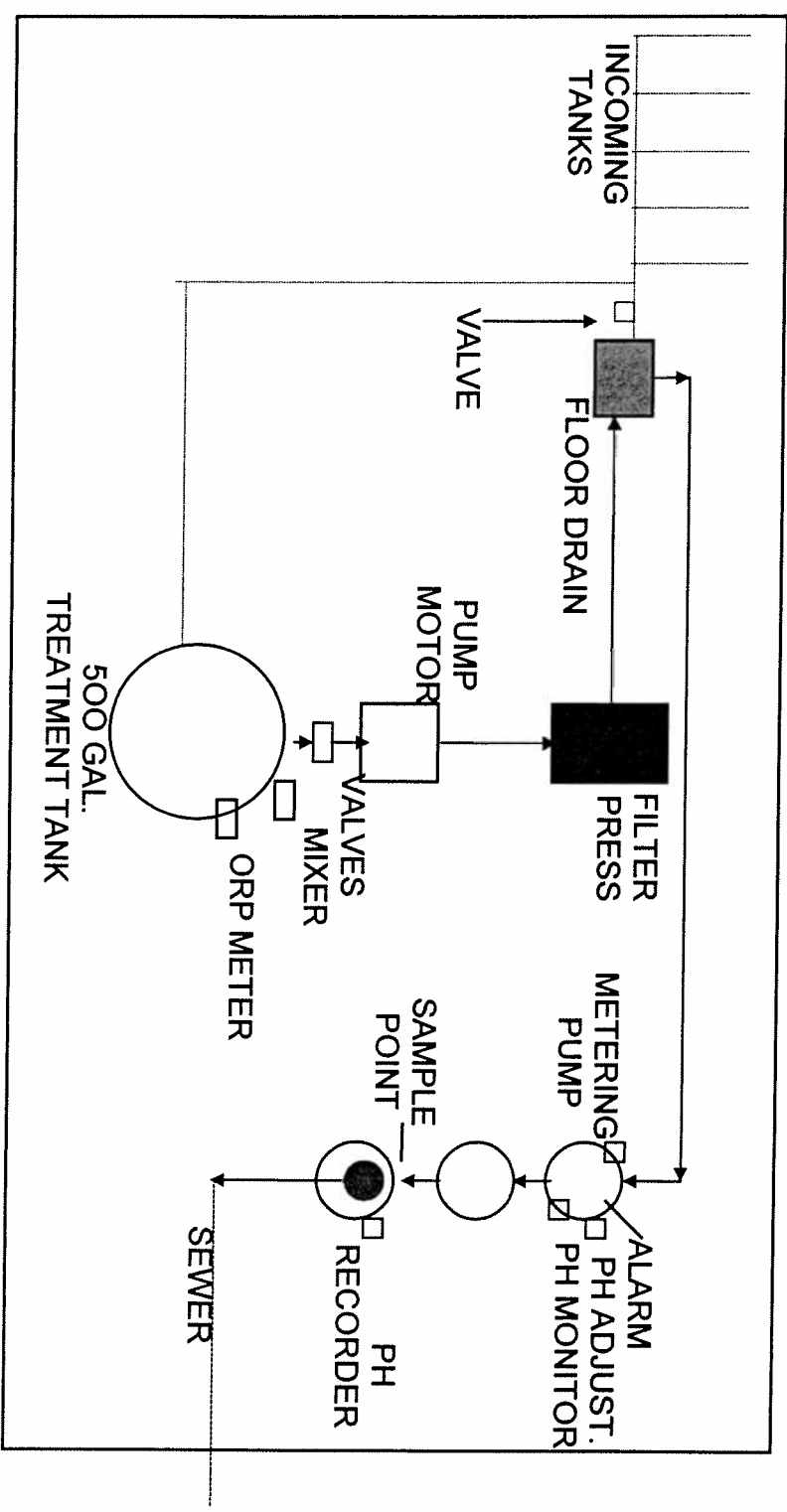
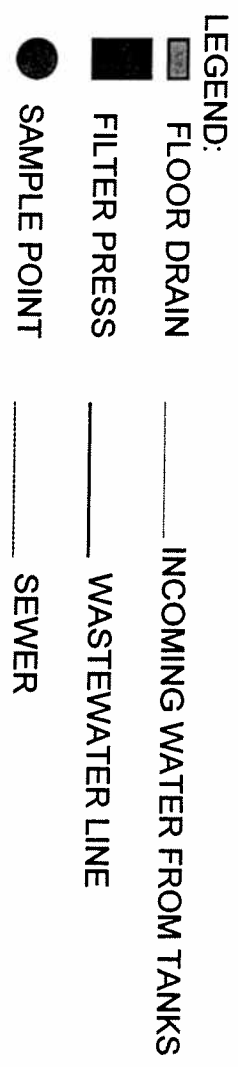


## LEGEND:

- MAIN WATER SOURCE
- SPILL CONTAINMENT
- - - WATER SUPPLY LINE
- - - WASTEWATER LINE
- - - SEWER

N ↑

MANUFACTURING PROCESS LAYOUT  
 PACIFIC MAGNETIC & PENETRANT CO.  
 6837 FARMDALE AVE. N.H. CA. 91605  
 DRAWN BY: ERIK B. ANDERSEN 5/19/99  
 APP. BY: ERIK B. ANDERSEN 5/19/99



**PRETREATMENT SYSTEM**

## **SLUG DISCHARGE CONTROL PLAN**

a) **SEWER DISCHARGE PRACTICES** - All sewer discharge practices performed by Pacific Magnetic & Penetrant Co. (PMP) are in compliance with permit # W-407316. Discharge to sewer is strictly controlled through one effluent source. This effluent source is directly after the three-stage clarifier, with no other means available for wastewater to reach sewer.

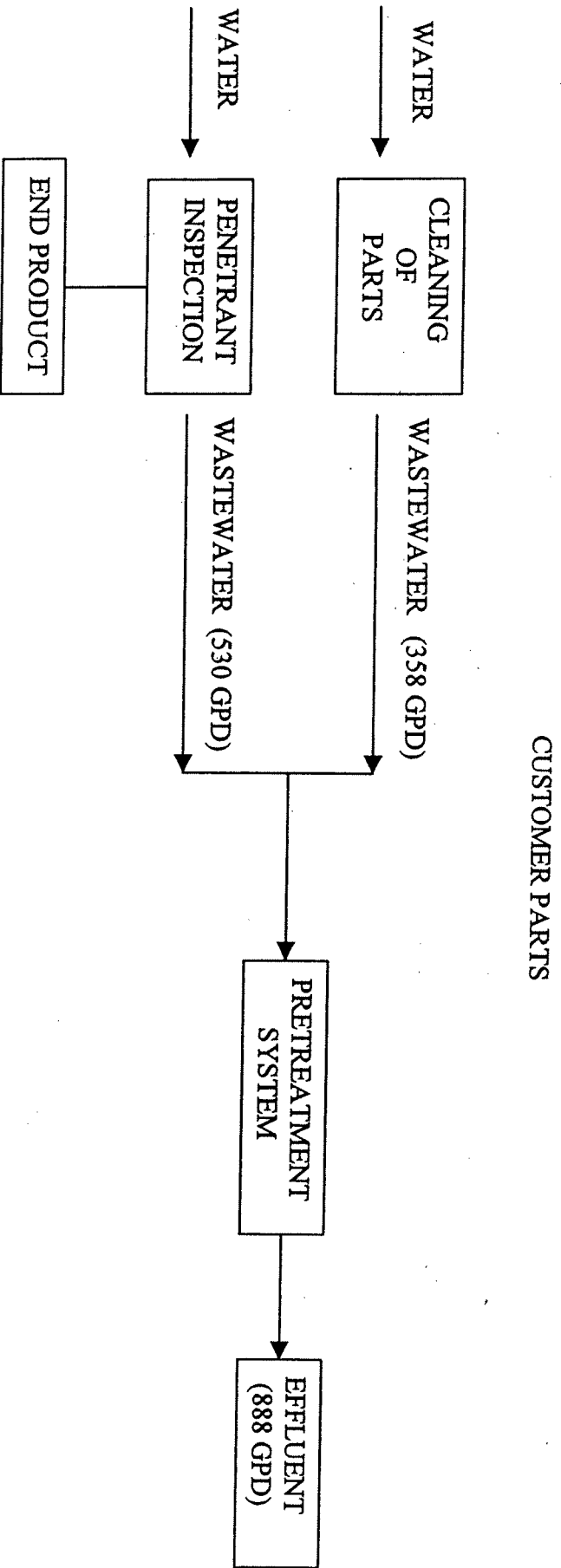
b) **NONROUTINE BATCH DISCHARGES** - All PMP business practices relating to chemical handling are controlled by concrete berms, all storage and transfers are also controlled by berms. In the unlikely event there was an uncontrolled batch release in these areas the entire quantity will be contained. In the event an uncontrolled batch release occurs outside these bermed areas, PMP has at its ready portable emergency berm containment devices to contain spills from an expected release. The shop design is such that no spill could enter the sewer system. As mentioned previously the only source to the sewer is through the three-stage clarifier.

c) PMP shop personnel handling chemicals have received proper training in the use and handling of chemicals at the facility.

d) **NOTIFICATION** procedures are in place to promptly contact the City and provide written notification within five days.

e) **DESCRIPTION** of stored chemicals at PMP. Including volume and chemical hazard classification. (Attached)

# MANUFACTURING PROCESS FLOW DIAGRAM AND WATER BALANCE



MANUFACTURING PROCESS FLOW  
DIAGRAM AND WATER BALANCE  
PROCESS #1 AND #2  
PACIFIC MAGNETIC & PENETRANT CO., INC.  
6837 FARMDALE AVE. N. HOLLYWOOD CA. 91605  
DRAWN BY: ERIK ANDERSEN 3/25/02  
APPROVED BY: ERIK ANDERSEN 3/25/02

PMP 1992-2003

6837 Farmdale Ave.

## TANK SCHEDULE

TANK I.D. NUMBER	TANK NAME	TANK VOLUME & DIMENSIONS	TANK CONTENTS	pH	IS THE TANK SPILL CONTAINED?	TANK CONSTRUCTION MATERIAL	TANK Temp F°	Chemical %
1	ACID BATH	90	NITRIC ACID TYPE 2 SODIUM DICHROMATE	1	YES	PVC	120-130	20-25 2-3
2	RINSE	90	WATER	5-9	"	PolyPro	Ambient	Ø
3	SEALER	90	SODIUM DICHROMATE	1	"	CPVC	140-160	5
4	ALKALINE CLEANER	90	TURCO 4215 NC-47	9.5	"	PolyPro	120-140	4-8/gal.
5	RINSE	90	WATER	5-9	"	"	Ambient	Ø
6	ACID BATH	90	NITRIC ACID	1	"	"	70-90	25-45
7	RINSE	90	WATER	5-9	"	"	Ambient	Ø
8	CLEANER	90	TURCO W.D.#1	9.5	"	"	Ambient	25
9	ACID BATH	90	Hydrochloric	1	"	"	Ambient	50-70
10	RINSE	90	WATER	5-9	"	"	Ambient	Ø
11	ACID BATH	90	NITRIC ACID	1	"	"	120-130	45-55
12	ACID BATH	90	NITRIC ACID	1	"	"	120-150	20-25
13	RINSE	90	HOT WATER	5-9	"	"	150	Ø
14	RINSE	90	WATER	5-9	"	"	Ambient	Ø
15	ALKALINE CLEANER	90	TURCO 4215 NC-47	9.5	"	"	120-140	4-8/gal

PROPERTY TANKS 304 3082



## TANK SCHEDULE

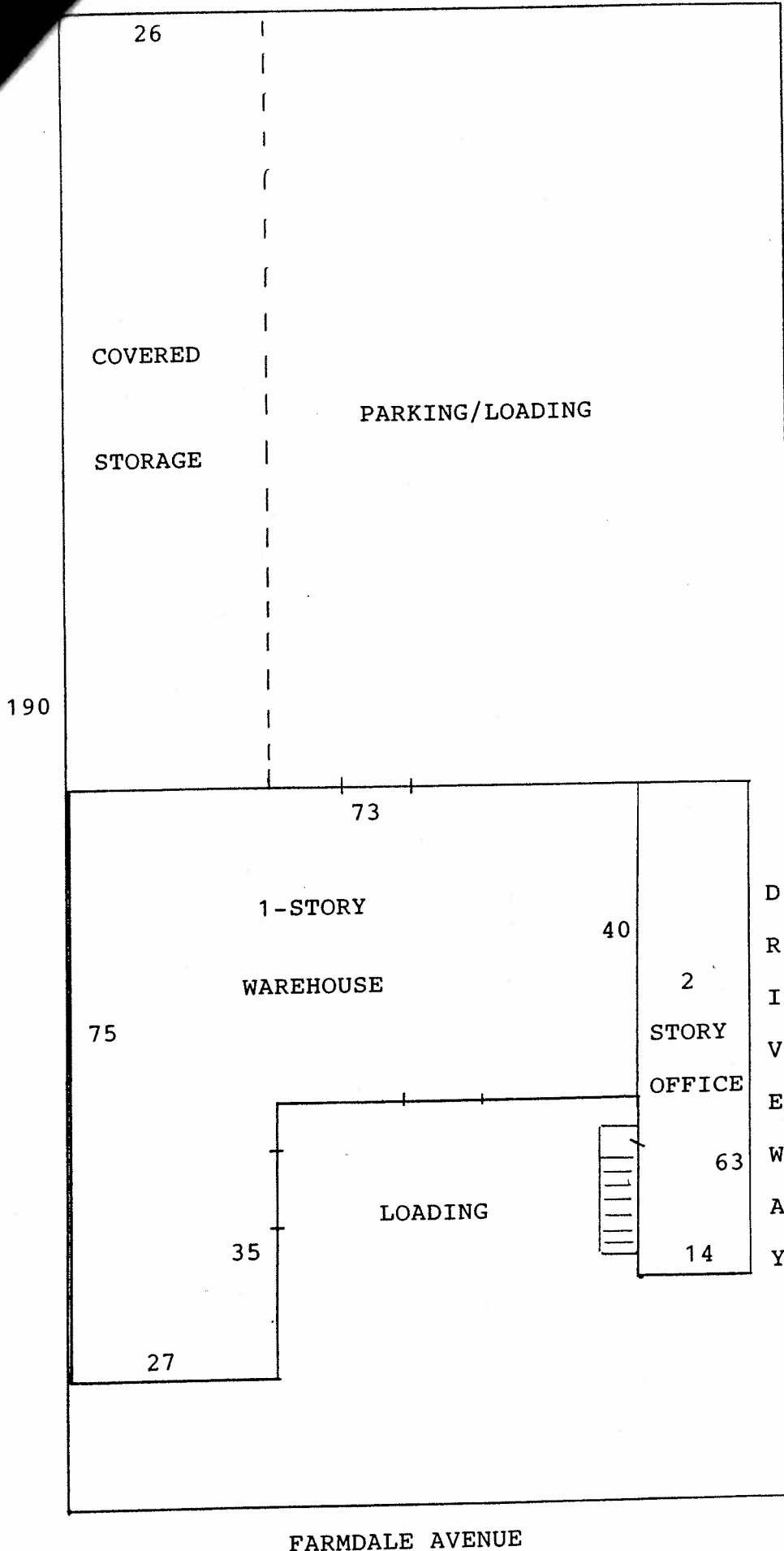
APRIL 1964 3082

6829 FARMDALE AVENUE

GROSS BUILDING AREA			
14	X	63	X 2 = 1,764
40	X	73	X 1 = 2,920
27	X	35	X 1 = 945

TOTAL GBA 5,629 SF

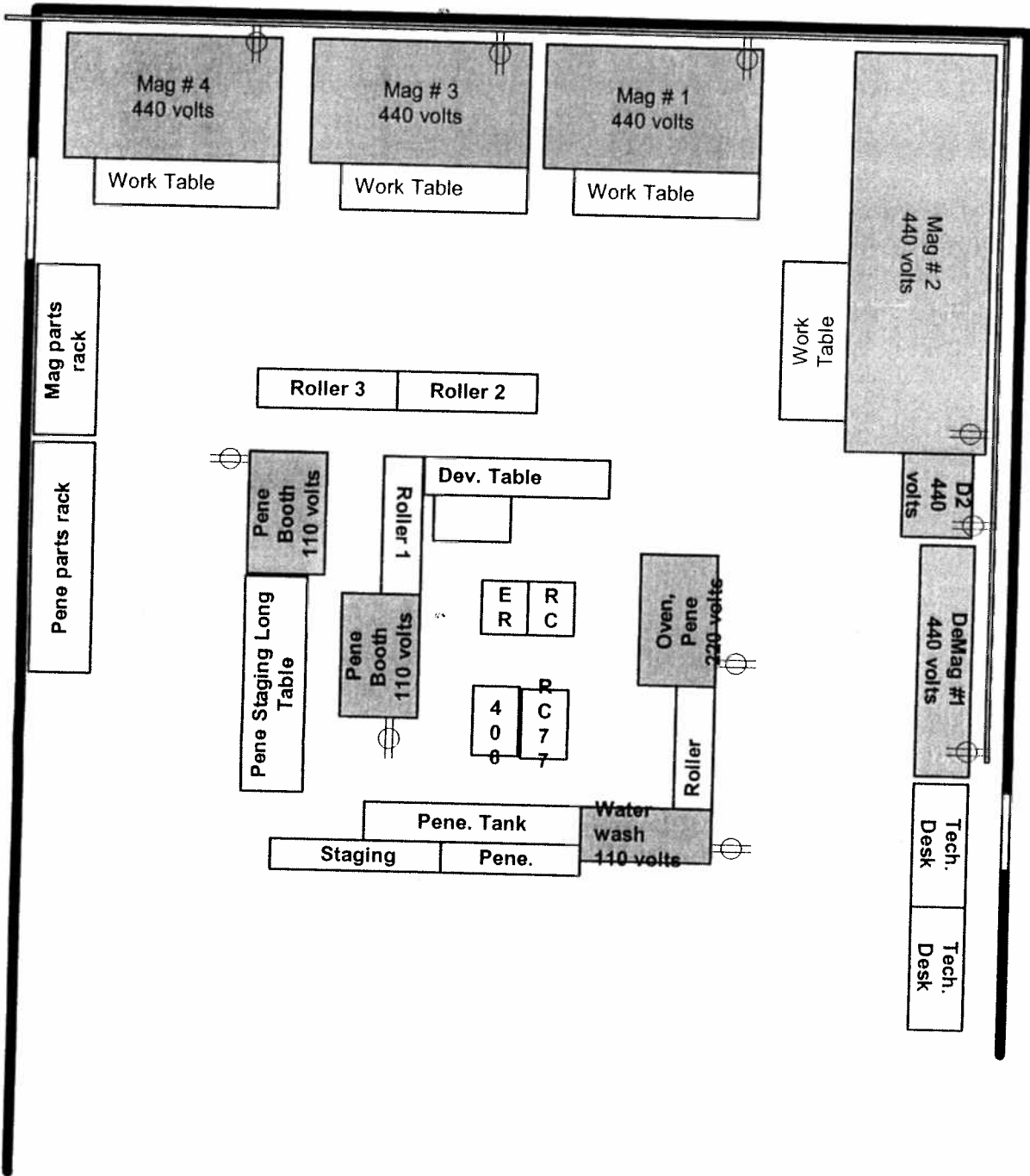
COVERED STORAGE:  
26 X 99 = 2,574 SF





Roof

6829 Farmdale Ave  
Center Shop - Process area #1

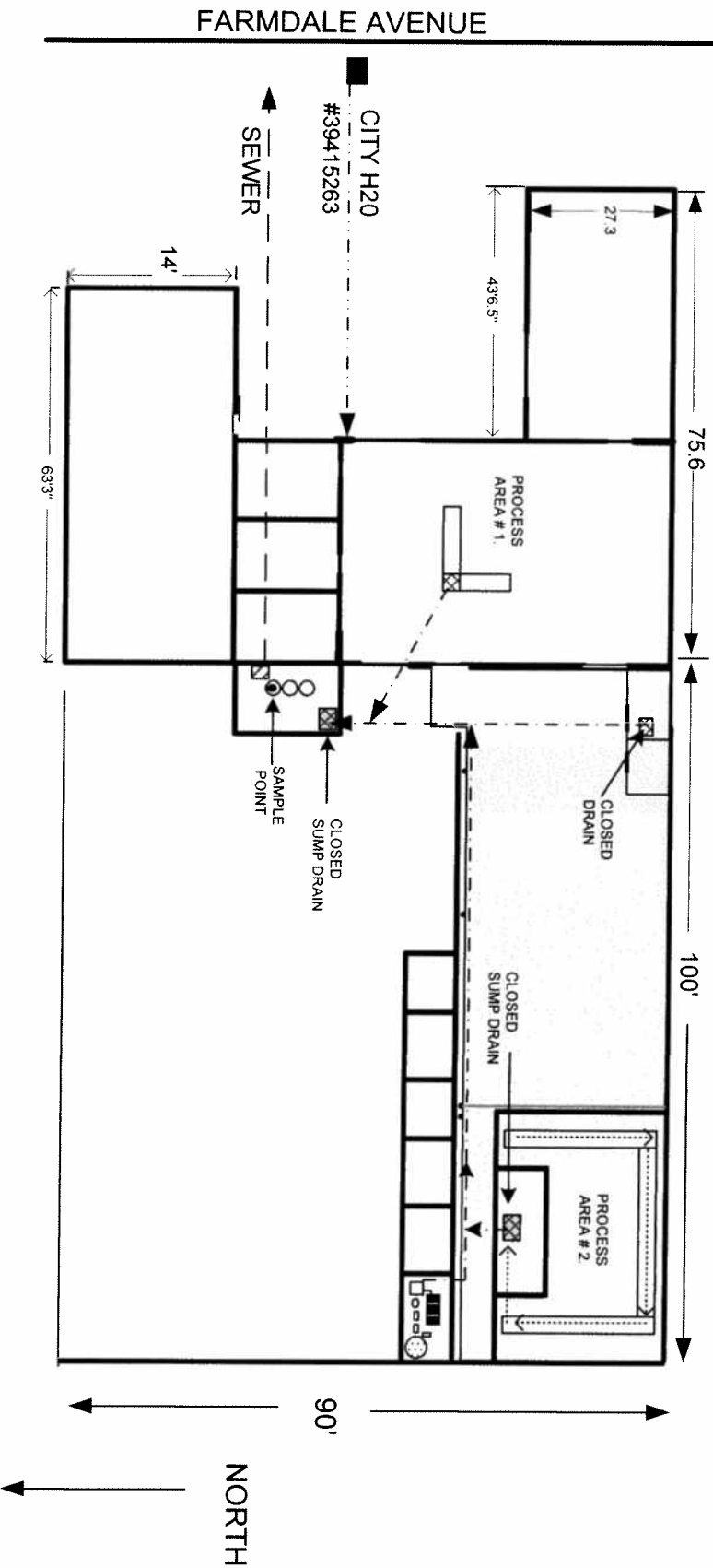


# SITE PLAN 6829 FARMDALE AVE. Not to scale

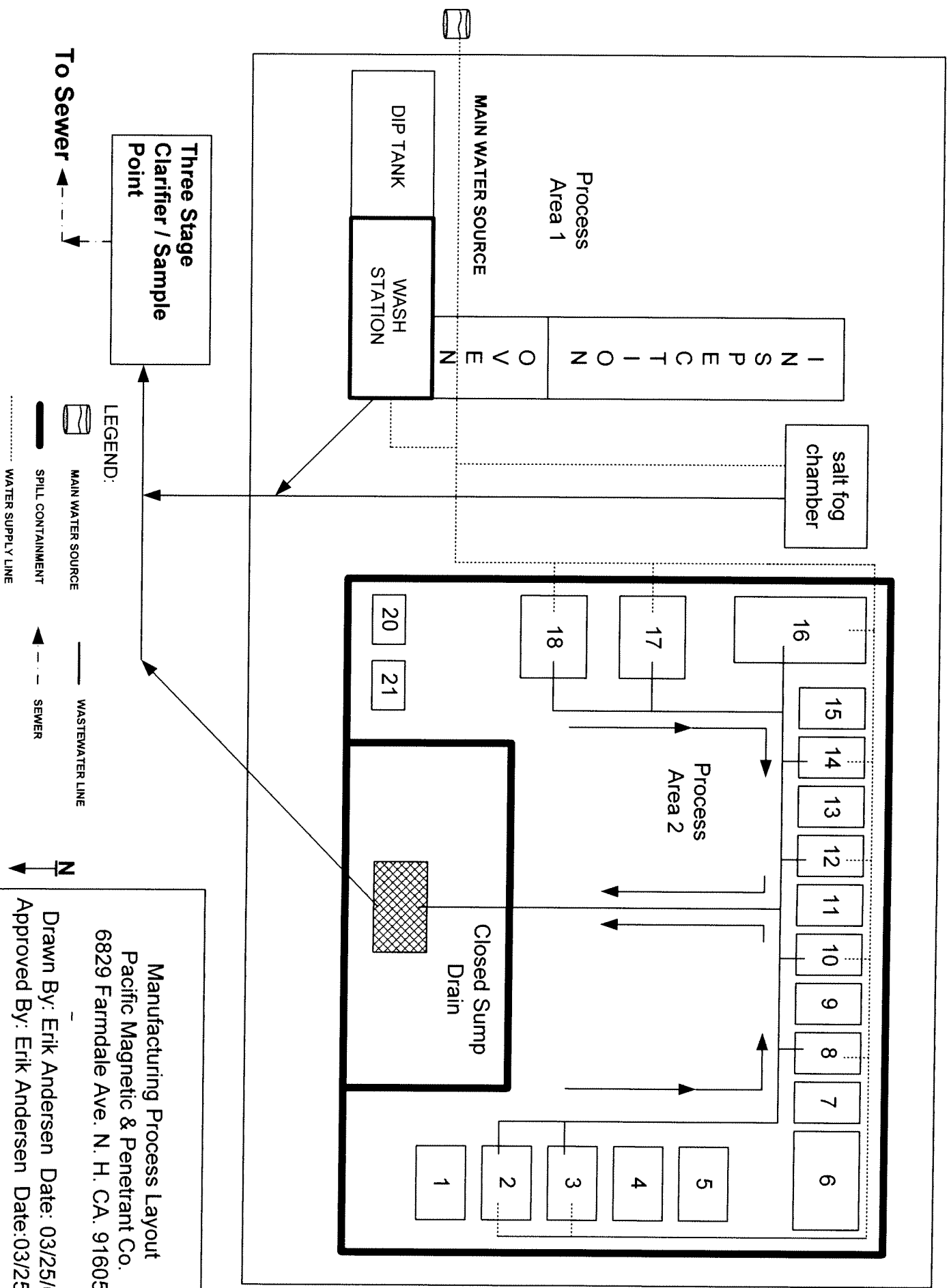
2006

## LEGEND:

■	WATER METER	--->	METERED CITY WATER SUPPLY LINE
●	SAMPLING POINT		
⊠	CLOSED LOOP DRAIN		
⊞	CLOSED LOOP SUMP DRAIN		
▣	SEWER DRAIN		
○	ABOVE GROUND CLARIFIER		
—	CONTAINMENT BERM		



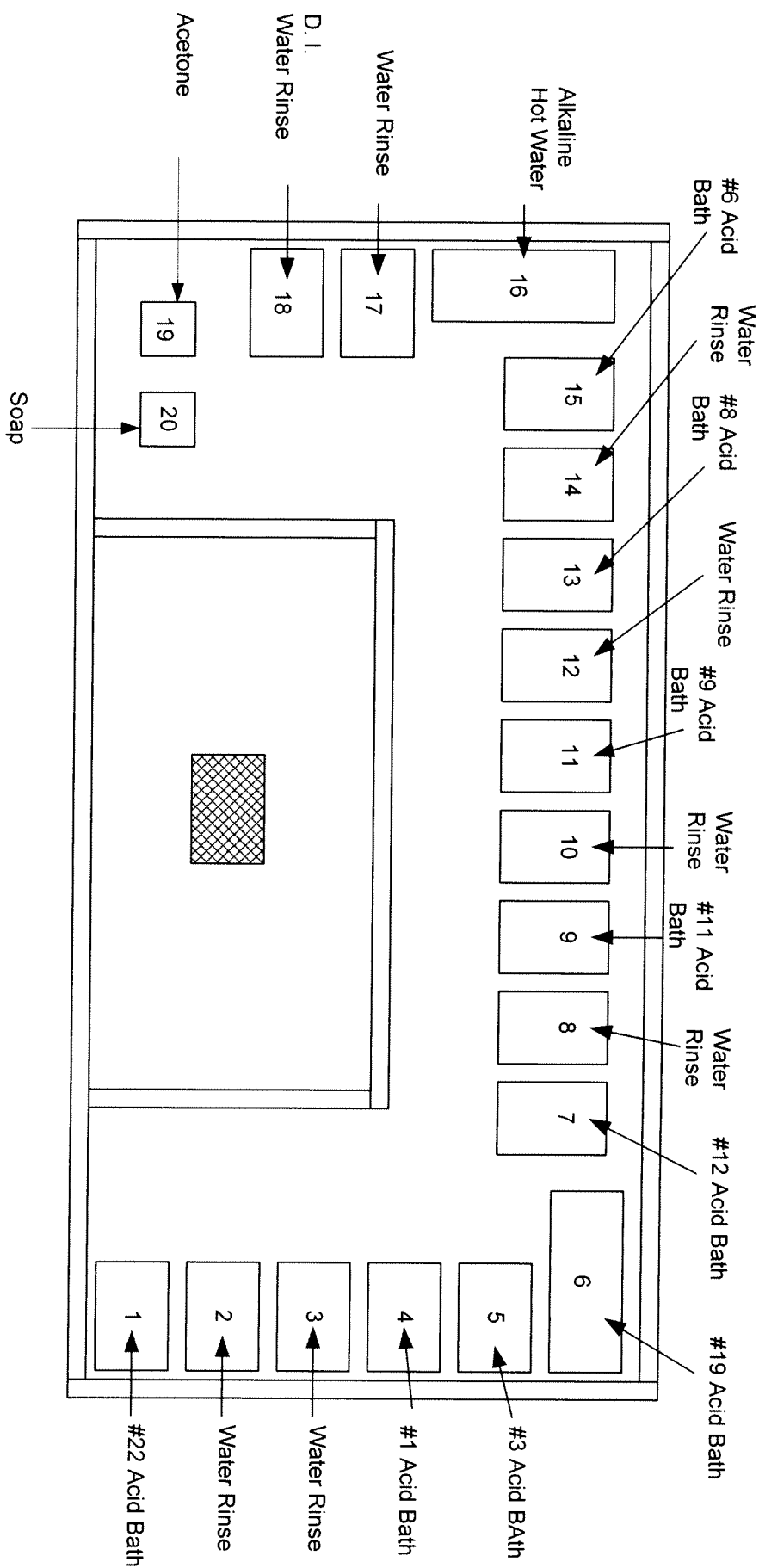
# MANUFACTURING PROCESS LAYOUT



Manufacturing Process Layout  
 Pacific Magnetic & Penetrant Co.  
 6829 Farmdale Ave. N. H. CA. 91605

Drawn By: Erik Andersen Date: 03/25/06  
 Approved By: Erik Andersen Date: 03/25/06

CHEMICAL PROCESSING SOLUTION CONTROL TABLE



Pacific Magnetic & Penetrant Co.  
6829 Farmdale Ave. N. H. C.A. 91605  
Drawn By: Erik Andersen Date: 03/25/06  
Approved By: Erik Andersen Date: 03/25/06

1996-2003  
FACT SHEET  
RENEWAL DATE: 6/30/96

**A. INDUSTRIAL USER INFORMATION**

Pacific Magnetic & Penetrant Co.  
6837 Farmdale Avenue  
N. Hollywood, CA 91605

IU006770  
W-407316

Erik Andersen, President  
(818) 765-7266

**B. DESCRIPTION OF FACILITY OPERATIONS**

Pacific Magnetic & Penetrant Co. performs the following core electroplating activities on military aerospace components: chemical etching and coating (passivation and chemical coating). This facility also performs the following ancillary operations: alkaline cleaning, solvent degreasing, and dye penetrant testing. The operations performed by this industry are under SIC Code 3479.

Pacific Magnetic & Penetrant Co. has been in operation since 1978. This company currently employs 22 people. The facility operates 2 shifts and discharges wastewater five days per week.

**C. SAMPLE POINT DESCRIPTION/FACILITY FLOW INFORMATION**

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
W-407316	01	3,036	3,036	The secured sampling facility located at the discharge of the three stage clarifier.
TOTAL		3,036	3,036	----

**D. PROCESS UNIT OPERATION/FLOW INFORMATION**

All parts received by Pacific Magnetic & Penetrant Co. go through one of three treatments depending on the customer's need. All three treatment cycles are differentiated by the first cleaning step. This step involves either solvent cleaning, alkaline cleaning, or acid etching. After this cleaning step all parts go through magnetic or florescent dye penetrant testing and then are either passivate coated, Iridite coated or dipped in oil. The total flow from the rinses following the various coating and cleaning operations along with flow from the dye testing is approximately 3,036 gallons per day, based on five operational days per week.

PERMIT NUMBER	SAMPLE POINT	PROCESS UNIT OPERATION CODE	PROCESS DESCRIPTION
W-407316	01	004	Coating
	01	005	Etching
	01	007	Cleaning
	01	037	Solvent Degreasing
	01	045	Testing



**E. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION**

There are no dilution wastestreams that combine with process wastestreams.

**F. FLOW MEASURING DEVICE**

Pacific Magnetic & Penetrant Co. is not required to install a flow measuring device.

**G. PRETREATMENT UNIT OPERATIONS**

The chromium-containing wastewater from the rinse tanks is sent to the reduction tank, while the rest of the wastewater from the various rinse tanks is sent directly to the sump.

In the reduction tank, the hexavalent chromium is reduced to trivalent chromium using sodium metabisulfite. Addition of sodium metabisulfite is controlled by an ORP meter. The wastewater from the reduction tank is then pumped to the filter press. The resulting filtrate is sent to the sump to mix with the other wastewater while the filter cake is hauled off-site. The wastewater from the sump is then sent to the above ground three-stage clarifier prior to discharge to the city sewer. In the first stage of the clarifier, pH is adjusted using sodium hydroxide and is controlled by a metering pump. The first stage of the clarifier is further equipped with an automatic pH monitoring and warning device which shuts off wastewater flow if the pH is out of the particular range.

Pacific Magnetic & Penetrant Co. does not have a formal Toxic Organic Management Plan (TOMP).

**INDUSTRIAL WASTEWATER PERMIT W-407316**

PRETREATMENT UNIT OPERATION CODE	PRETREATMENT UNIT OPERATION DESCRIPTION
CL0080	Clarification
NE0010	Neutralization
HE0010	Hexavalent Chrome Reduction
SG0040	Sludge Dewatering - Filter Press

**H. DISCHARGE LIMITATIONS**

See permit, PART 2 - DISCHARGE LIMITATIONS.

**I. MONITORING REQUIREMENTS**

See permit, PART 3 - MONITORING REQUIREMENTS.

**J. REPORTING REQUIREMENTS**

See permit, PART 4 - REPORTING REQUIREMENTS.

**K. SPECIAL CONDITIONS**

See permit, PART 5 - SPECIAL CONDITIONS.

**L. STANDARD CONDITIONS**

See permit, PART 6 - STANDARD CONDITIONS.

**M. RATIONALE FOR EFFLUENT LIMITATIONS**

Pacific Magnetic & Penetrant Co. began electroplating operations at this site in 1978, and does not own any of the parts that they metal finish. Pacific Magnetic & Penetrant Co. added no regulated processes that were substantially independent of the existing operations, and they had no major construction changes. Existing sources are those that began operations prior to the August 31, 1982 publication date of the proposed rule for metal finishers, and job-shops are those facilities that own no more than 50% of the parts undergoing electroplating operations. Consequently, Pacific Magnetic & Penetrant Co. qualifies as an existing, job-shop electroplater subject to the federal categorical pretreatment standards set forth in 40 CFR 413 Subpart E (Coating Subcategory) and F (Chemical Etching and Milling Subcategory).

Electroplating regulations set standards that are less stringent for dischargers of less than 10,000 gpd than for dischargers of more than 10,000 gpd. Pacific Magnetic & Penetrant Co. discharges approximately 3,036 gpd; therefore, they qualify for the less stringent standards.

Two sets of limits apply to the discharges from this facility to the City of Los Angeles sewerage system: concentration based Federal Categorical Pretreatment Standards and the Local limits. Sampling Point 01 is located at the end of the regulated process. Therefore, it qualifies as a representative point to determine compliance with applicable federal pretreatment standards. Sampling Point 01 is also located at the end-of-pipe prior to discharge to the city sewer system. Therefore, it qualifies as a point to determine compliance with the local limits. Consequently, Pacific Magnetic & Penetrant Co. must comply with the Federal Categorical Pretreatment Standards and the City of Los Angeles Local limits at Sample Point 01.

According to the EPA, facilities subject to 40 CFR 413 Electroplating Regulations must analyze for reasonably expected toxic organics. Pacific Magnetic & Penetrant Co. shall be required to continue analyzing and reporting all reasonably expected toxic organics as specified in the permit issued prior to this 1996 renewal. The reasonably expected toxic organics list is as follows: Chloroform.

Pacific Magnetic & Penetrant Co. may submit a Toxic Organic Management Plan (TOMP) for review and approval by the Bureau. If approved, the TOMP will satisfy the above requirement and Pacific Magnetic & Penetrant Co. will be exempt from monitoring total toxic organics.

Prepared By: Brian Shaver Date: 6/25/96

Reviewed By: SGB Date: 6/26/96  
IU006770.FST/BS

**FACT SHEET**

1993-1994

**A. INDUSTRIAL USER INFORMATION**

Pacific Magnetic & Penetrant Co.  
6837 Farmdale Avenue  
N. Hollywood, CA 91605

IU No.: IU006770  
Permit No.: W-407316

Mr. Erik Anderson, President  
(818) 765-7266

**B. DESCRIPTION OF THE FACILITY OPERATIONS**

Pacific Magnetic & Penetrant Co. performs the following core electroplating activities on military aerospace components: chemical etching and coating (passivation and chemical coating). This facility also performs the following ancillary operations: alkaline soap cleaning, solvent degreasing, and dye penetrant testing. The operations performed by this industry are under SIC Code 3479.

Pacific Magnetic & Penetrant Co. has been in operation since 1978. This company currently employs 22 people. The facility operates 2 shifts and discharges wastewater five days per week.

**C. DESCRIPTION OF THE DISCHARGE AND WASTEWATER CONTROL**

**1. PROCESS WASTESTREAMS**

All parts received by Pacific Magnetic & Penetrant Co. go through one of three treatments depending on the customer's need. All three treatment cycles are differentiated by the first cleaning step. This step involves either solvent cleaning, alkaline cleaning, or acid etching. After this cleaning step all parts go through magnetic or florescent dye penetrant testing and then either passivate coated, Iridite coated or dipped in oil. The total flow from the rinses following the various coating and cleaning operations along with flow from the dye testing is approximately 5,500 gallons per day.

**2. DILUTION WASTESTREAMS**

There are no dilution wastestreams at this facility.

**3. WASTEWATER CONTROL**

All wastewater from the various rinse tanks is sent to the three-stage clarifier before discharge to the city sewer.

Pacific Magnetic & Penetrant Co. does not have a formal Toxic Organic Management Plan (TOMP).

**D. DISCHARGE LIMITATIONS AND POINT OF COMPLIANCE**

1. The permittee is authorized to discharge industrial wastewater to the City of Los Angeles sewer system from the sampling point listed below.

Description of sampling point:

<u>Sampling Point</u>	<u>Wastewater Flow (gpd)</u>		<u>Description</u>
	<u>Total</u>	<u>Process</u>	
01	5,500	5,500	The sampling point located at the discharge of the three-stage clarifier.

2. Pacific Magnetic & Penetrant Co. must comply with the following Federal Categorical Pretreatment Standards at Sampling Point 01 (Attachment A).

**FEDERAL CATEGORICAL PRETREATMENT STANDARDS  
FOR PACIFIC MAGNETIC & PENETRANT CO.  
(Pretreatment Standards for Existing Sources 40 CFR 413)**

<u>Constituents</u>	<u>Units</u>	<u>Daily Maximum</u>	<u>4 - Day Average</u>
Cadmium (Total)	mg/l	1.20	0.70
Cyanide (Free)[1]	mg/l	5.00	2.70
Lead (Total)	mg/l	0.60	0.40
TTO [2]	mg/l	4.57	---

3. Pacific Magnetic & Penetrant Co. must comply with the following City of Los Angeles Local limits at Sampling Point 01 (Attachment A).

**LOCAL LIMITS  
Pacific Magnetic & Penetrant Co.**

<u>Constituents</u>	<u>Units</u>	<u>Instantaneous Maximum</u>
Arsenic	mg/l	3.00
Cadmium	mg/l	15.00
Copper	mg/l	15.00
Cyanide (Free)[1]	mg/l	2.00
Cyanide (Total)	mg/l	10.00
Dissolved Sulfides	mg/l	0.10
Lead	mg/l	5.00
Nickel	mg/l	12.00
pH	Standards	5.50 - 11.00
Silver	Units (S.U.)	5.00
Chromium (Total)	mg/l	10.00
Zinc	mg/l	25.00
Oil and Grease (Dispersed)	mg/l	600.00

### Footnotes to Discharge Standards

- [1] Cyanide (Free) shall mean cyanide amenable to chlorination as defined by 40 CFR 136.
- [2] Total Toxic Organics (TTO) shall be the summation of all quantifiable values greater than 0.01 milligrams per liter for the organics listed in 40 CFR 413.

### E. RATIONALE FOR EFFLUENT LIMITATIONS

Pacific Magnetic & Penetrant Co. began operations in 1978 and does not own any of the materials that undergo electroplating. Existing sources are those that began operations prior to the August 31, 1982 publication date of the proposed rule for metal finishers. Job shops are defined as those facilities which own less than 50% of the materials undergoing metal finishing. Therefore, Pacific Magnetic & Penetrant Co. qualifies as an existing source, job-shop, electroplater subject to the Federal Categorical pretreatment standards set in 40 CFR 413 Subparts E and F (Coating and Chemical Etching and Milling).

Electroplating regulations set standards that are less stringent for dischargers of less than 10,000 gallons per day than for larger dischargers of more than 10,000 gallons per day. Pacific Magnetic & Penetrant Co. qualifies for the less stringent standards as it discharges an average of 5,500 gallons per day.

Two sets of limits apply to the discharges from this facility to the City of Los Angeles sewerage system: concentration based Federal Categorical Pretreatment Standards and the Local limits. Sampling Point 01 is located at the end of the regulated process. Therefore, it qualifies as a representative point to determine compliance with applicable federal pretreatment standards. Sampling Point 01 is also located at the end-of-pipe prior to discharge to the city sewer system. Therefore, it qualifies as a point to determine compliance with the local limits. Consequently, Pacific Magnetic & Penetrant Co. must comply with the Federal Categorical Pretreatment Standards and the City of Los Angeles Local limits at Sampling Point 01.

**F. MONITORING REQUIREMENTS**

1. Pacific Magnetic & Penetrant Co. shall monitor at Sampling Point 01, for the following parameters, at the indicated frequency and by the sample type:

<u>Constituent</u>	<u>Units</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	GPD	---	Report
Arsenic	mg/l	once/6 mo. [1]	Grab or Composite [2]
Cadmium (Total)	mg/l	once/6 mo. [1]	Composite
Chromium (Total)	mg/l	once/6 mo. [1]	Grab or Composite [2]
Copper (Total)	mg/l	once/6 mo. [1]	Grab or Composite [2]
Cyanide (Total)	mg/l	once/6 mo. [1]	Grab
Cyanide (Free)	mg/l	once/6 mo. [1]	Grab
Lead (Total)	mg/l	once/6 mo. [1]	Composite
Nickel (Total)	mg/l	once/6 mo. [1]	Grab or Composite [2]
pH [3]	S.U.	once/6 mo. [1]	Grab
Silver (Total)	mg/l	once/6 mo. [1]	Grab or Composite [2]
Zinc (Total)	mg/l	once/6 mo. [1]	Grab or Composite [2]
Dissolved Sulfides	mg/l	once/6 mo. [1]	Grab
Oil & Grease (Dispersed)	mg/l	once/6 mo. [1]	Grab
Total Toxic Organics (TTO)	mg/l	once/6 mo. [1]	Grab
Chlorides [5]	mg/l	once/6 mo. [1]	Grab or Composite

**FOOTNOTES TO MONITORING REQUIREMENTS**

- [1] The samples shall be taken on a day when these substances are likely to be present in their maximum concentration.
- [2] If the sample type is denoted grab or composite, the industry has the option of choosing either one. Unlike Federal categorical pretreatment standards for heavy metals, the Local limits for heavy metals can be compared to the results from the grab sampling as well as composite sampling.
- [3] The pH of wastewater discharge to the sewer system shall be monitored and recorded continuously using a pH meter and recorder.
- [4] For the first self-monitoring event, Pacific Magnetic & Penetrant Co. must analyze for all toxic organics listed on Page 3 of this permit.

For subsequent self-monitoring events at each sampling point, Pacific Magnetic & Penetrant Co. must prepare an inventory of all toxic organics used and identify the individual toxic organics, listed on page 3 of this permit, which can reasonably be expected to be present in the regulated wastewater. Self-Monitoring reports must include the concentration of each reasonably expected toxic organic constituent analyzed in addition to the total sum of all values greater than 0.01 mg/l.

- [5] The City is establishing a data base for chlorides.

**G. REPORTING REQUIREMENTS**

Pacific Magnetic & Penetrant Co. is required to submit the following reports:

1. The first self-monitoring event wastewater analysis shall be conducted by **August 31, 1993**. This report is due on **September 15, 1993**.
2. The second self-monitoring event wastewater analysis shall be conducted between **September 1, 1993** and **October 31, 1993**. This report is due on **November 15, 1993**.
3. For subsequent self-monitoring events, results obtained shall be summarized and reported on a Periodic Compliance Report form and submitted by the 15th day of the month following the monitoring period. The report for this monitoring period (January-June 1994) shall be submitted by **July 15, 1994**. Subsequent reports shall be submitted semi-annually.

**H. SPECIAL CONDITIONS**

**1. SAMPLE BOX INSTALLATION OR MODIFICATION**

a. By **July 30, 1993**, Pacific Magnetic & Penetrant Co. shall submit plans and diagrams for the installation of a Secured Sampling Facility (SSF) for Bureau of Sanitation approval at Sampling Point 01. The SSF must be an enclosed structure and possess minimum inside dimensions of 24" x 27" x 36". A lockable door is required and must be installed to provide safe and convenient access to the internal space of the SSF by representatives of the Bureau. The door must be equipped with a latch and hasp or other mechanism such that a padlock can be placed by a Bureau representative to secure the facility during sampling with Bureau equipment. The SSF must be designed to allow the suction end of the sampling tube and pH probe cable to pass from the monitoring equipment to the sampling point. The SSF must be bolted to the sampling location from the inside. The design must ensure that the sampling tube and other devices will be tamper-proof. The SSF may be designed so that it is removable when not in use. However, when in use, it must be fastened to the sampling location until the sampling event is completed and the Bureau has unlocked the door and removed its equipment.

b. Within 30 days of approval, Pacific Magnetic & Penetrant Co. shall complete installation of the SSF.

**2. pH METER INSTALLATION FOR SAMPLING POINT 01**

By **August 31, 1993**, a pH meter and recorder must be installed to continuously monitor the wastewater at Sampling Point 01. A logbook for pH calibration must be kept. The pH chart must be initialed daily by an operator at the facility.

### **3. SAMPLING POINT IDENTIFICATION**

a. Upon installation of the secured sampling facility, the sampling point located at the secured sampling facility at the discharge of the three stage clarifier (Sampling Point 01) shall be identified with a sign or placard containing the following information:

City of Los Angeles  
Sampling Point 01  
IW Permit No. W-407316

The sign or placard shall have a minimum dimension of 4 inches by 16 inches with the lettering a minimum height of 3/4 inches. The sign shall be protected or placed on a material to withstand corrosion and water damage. The sign or placard shall be posted at the sampling location to allow for immediate identification.

### **4. SPILL CONTAINMENT REQUIREMENTS**

By August 31, 1993, construction plans must be submitted to this office detailing berming of the passivation and chem film processing area shown in Attachment A.

The drawings shall indicate the size, dimension, and material of construction for each berm. The calculated volume for each spill containment area shall be specified. In addition, approval of the plans by this Bureau does not relieve the permittee of its duties to comply with all other Los Angeles City requirements, i.e. Los Angeles City Fire Department requirements, Building and Safety Code requirements and any other applicable regulations.

Construction plans will be approved based on the following criteria:

- a. Spill containment facilities shall be designed to hold any drag-out process material, accidental spill, leaking tanks or piping and shall provide containment of any wastewater discharge from the area;
- b. Spill containment area volume shall be the largest of either 110% of the largest tank or 10% of the total process volume within the bermed area;
- c. Spill containment located outdoors must be roofed or provide a volume equal to the above criteria plus capacity of a rainfall of 24 hours of the 25 year storm (Contact LA County Flood Control, Flood Control Office for information on 25 year storm in your area);
- d. Outside storage areas that are accessible to the public must be secured with fencing and a lockable entry gate;
- e. Spill containment must provide separation of incompatible chemicals with berming or an impermeable barrier. Double-walled tanks will not meet the criteria of the Bureau of Sanitation;



- f. All berm penetrations must be sealed;
- g. The process floor and berms must be constructed of or coated with a material capable of withstanding spills of chemicals being stored;
- h. All drains shall be eliminated from within the spill contained area. (In cases where emergency showers or eye washes are located within the bermed area, drains must be located directly underneath and must be elevated at least to the level of the spill containment walls).

#### 5. SUBMITTAL OF PLANS

Submittals for Secured Sampling Facility (SSF) and berming installation shall be sent to the following address:

City of Los Angeles  
Bureau of Sanitation/Enforcement Division  
4590 Colorado Blvd.  
Los Angeles, CA 90039

ATTN: Brian Shoener

#### 6. TOTAL TOXIC ORGANICS SELF-MONITORING FOR SAMPLING POINT 01

For the first self-monitoring event, Pacific Magnetic & Penetrant Co. must analyze for all toxic organics listed on Page 3 of this permit.

For subsequent self-monitoring events at each sampling point, Pacific Magnetic & Penetrant Co. must prepare an inventory of all toxic organics used and identify the individual toxic organics, listed on page 3 of this permit, which can reasonably be expected to be present in the regulated wastewater. Self-Monitoring reports must include the concentration of each reasonably expected toxic organic constituent analyzed in addition to the total sum of all values greater than 0.01 mg/l.

#### I. STANDARD CONDITIONS

Standard conditions are in accordance with L.A.M.C. Section 64.30.

#### J. ATTACHMENTS

Attachment A - Site Plan  
Attachment B - Manufacturing Process Layout  
Attachment C - Tank Schedule

Prepared By: Brian Shoener Date: 6/23/93

Reviewed By: William J. Greaney Date: 6/28/93

PMPFS.WP\BS

**A. INDUSTRIAL USER INFORMATION**

Pacific Magnetic & Penetrant Co., Inc.  
 Dba: Pacific Magnetic & Penetrant  
 6829 Farmdale Avenue  
 North Hollywood, CA 91605

IU101472  
 W-508508

Erik Andersen, President  
 (818) 765-7266, ext. 6

**B. DESCRIPTION OF FACILITY OPERATIONS**

Pacific Magnetic & Penetrant is primarily engaged in non-destructive magnetic and penetrant dye testing/laboratory, and passivation operations of military aerospace parts and components (SIC 3479). The core unit operation performed in the facility is passivation. Ancillary operations include acid and alkaline cleaning, dye penetrant testing and magnetic testing.

Pacific Magnetic & Penetrant began operation in June 2006. Pacific Magnetic & Penetrant operates five days per week and employs 21 personnel.

**C. SAMPLE POINT DESCRIPTION/FACILITY FLOW INFORMATION**

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
W-508508	01	651	651	The SSF is located at the discharge end of the three-stage above-ground clarifier.
TOTAL		651	651	----

**D. PROCESS UNIT OPERATION/FLOW INFORMATION**

All parts and components received from the customers by Pacific Magnetic & Penetrant are processed through different treatment operations per client's specification needs and/or Government's specifications. These parts and components undergo through one or series of the following sequence of operations:

1. Magnetic Particles Testing;
2. Liquid Penetrant Testing;
3. Alkaline Cleaning; and
4. Passivation.

The total amount of process wastewater generated from rinses following these operations is approximately 651 gallons per day based on five operational days per week.

PERMIT NUMBER	SAMPLE POINT	PROCESS UNIT OPERATION CODE	PROCESS DESCRIPTION
W-508508	01	CLEA110	Acid Cleaning - Rinse
		CLEB120	Alkaline Cleaning - Rinse
		COAT100	Coating - Chemical Conversion Coating / Metal Coloring / Passivation
		TESA100	Testing / Inspection – Dye Penetrant Testing (Wastewater)

**E. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION**

Pacific Magnetic & Penetrant does not generate dilution wastestreams that combine and mix with process wastewater prior to Sample Point 01.

**F. FLOW MEASURING DEVICE**

Pacific Magnetic & Penetrant is not required to install or maintain a flow meter.

**G. PRETREATMENT UNIT OPERATIONS**

The wastewater generated from the batch tank rinses, following the Passivation (coating) operation, is mixed with the wastewater from Liquid Penetrant Testing and gravity flows into the floor sump pit. From the sump, the wastewater is pumped into a 500-gallon Treatment Tank where sodium metabisulfite is added treating hexavalent chrome to trivalent chrome. From the Treatment Tank, the wastewater is pumped to the filter press for dewatering. The filtrate from the filter press flows into the first-stage of the above ground three-stage clarifier where pH of the wastewater is monitored periodically. A metering pump is used to add sodium hydroxide to control pH. In addition, the first-stage of the three-stage clarifier is equipped with an automatic pH monitoring and warning devices which automatically shut-off when pH is out of range. The wastewater is then discharged into the sewer through Sample Point 01.

The filter cake produced from the filter press operation is being collected in a 55-gallon drums and manifested offsite for disposal.

**INDUSTRIAL WASTEWATER PERMIT W-508508**

PRETREATMENT UNIT OPERATION CODE	PRETREATMENT UNIT OPERATION DESCRIPTION
CL0080	Clarification
NE0010	Neutralization
SG0040	Sludge Dewatering – Filter Press

**H. POLLUTION PREVENTION**

Pacific Magnetic & Penetrant has implemented the following pollution prevention practice(s).

<b>POLLUTION PREVENTION PRACTICE CODE</b>	<b>PRETREATMENT UNIT OPERATION DESCRIPTION</b>
<b>OPM60</b>	<b>Employee training</b>
<b>OPM70</b>	<b>Housekeeping</b>
<b>OPM80</b>	<b>Segregation of wastestream to elimination formulation of pollutants</b>
<b>WC80</b>	<b>Use of spray rinsing</b>

**I. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS**

See permit, PART 2 - DISCHARGE LIMITATIONS.  
See permit, PART 3 - MONITORING REQUIREMENTS.

**J. REPORTING REQUIREMENTS**

See permit, PART 4 - REPORTING REQUIREMENTS.

**K. SPECIAL CONDITIONS**

See permit, PART 5 - SPECIAL CONDITIONS.

**L. STANDARD CONDITIONS**

See permit, PART 6 - STANDARD CONDITIONS.

**M. RATIONALE FOR EFFLUENT LIMITATIONS**

Pacific Magnetic & Penetrant began operation in June 2006 at this facility. Pacific Magnetic & Penetrant is primarily engaged in non-destructive magnetic and penetrant dye testing/laboratory, and passivation operations. The core unit operation performed is passivation - one of the six core operations covered under the Metal Finishing Point Source Category (40 CFR 433). New sources are those facilities that began operations after the August 31, 1982 publication date of the proposed Metal Finishing Point Source Category (40 CFR 433). Job-shops are defined as those facilities that own not more than 50% of the material undergoing metal finishing. Therefore, Pacific Magnetic & Penetrant qualifies as a new source, job-shop; metal finisher subject to the Federal Categorical Pretreatment Standards set in 40 CFR 433 Subpart A (Metal Finishing - Pretreatment Standards For New Sources).


According to 40 CFR 433, self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Since Pacific Magnetic & Penetrant does not discharge cyanide-bearing wastewater to the sewer and therefore does not have cyanide treatment; the Cyanide (Total) limits shall be applied at Sample Point 01. As a result, Sample Point 01 qualifies as the representative point to monitor and determine compliance for Cyanide (Total). The Bureau of Sanitation has adopted the limit for Daily Maximum and Monthly Average limit for Cyanide (Total) to be 0.07 mg/l for Pacific Magnetic & Penetrant. The value 0.07 mg/l is the value used as a threshold in other Federal Categories including Aluminum Forming and Coil Coating to determine the requirement for performing cyanide sampling.

Pacific Magnetic & Penetrant has no dilution wastestreams or other regulated wastestreams that combine with the process wastewater. Therefore, the use of Combined Wastestream Formula is not required.

According to EPA, facilities subject to 40 CFR 433 Metal Finishing Regulations must analyze for reasonably expected toxic organics. The Bureau of Sanitation does not have any sampling data to establish the reasonably expected toxic organics list for Pacific Magnetic & Penetrant. Therefore, Pacific Magnetic & Penetrant is required to monitor for all 111 total toxic organics. The Bureau of Sanitation will then establish a reasonably expected total toxic organics list for Pacific Magnetic & Penetrant after having gathered sample data from Pacific Magnetic & Penetrant and POTW monitoring.

Pacific Magnetic & Penetrant may submit a Toxic Organic Management Plan (TOMP) for review and approval by the Bureau. If approved, the TOMP will satisfy the above requirement and Pacific Magnetic & Penetrant will be exempt from monitoring Total Toxic Organics.

Prepared By: J. J. J. J. J. Date: 10/31/00

Reviewed By:  Date: 10-31-06